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**Lisa M. Chandler**

Also admitted in the District of Columbia

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September 24, 1998

**VIA FEDERAL EXPRESS**

**Ms. Magalie Roman Salas**  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

**Re: Reply Comments of the Small Cable Business Association  
CS Docket No. 98-132**

Dear Ms. Salas:

On behalf of the Small Cable Business Association ("SCBA"), we enclose an original and nine (9) copies of the above-referenced Reply Comments. We request that each Commissioner receive a copy of SCBA's Reply Comments.

In addition, we enclose a "FILE" copy. Please date-stamp and return the "FILE" copy in the enclosed Federal Express envelope.

If you have any questions, please call us.

Very truly yours,

*Lisa M. Chandler*  
Lisa M. Chandler

Enclosures

cc: Small Cable Business Association

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of	)	
	)	
1998 Biennial Regulatory Review --	)	CS Docket No. 98-132
Streamlining of Cable Television	)	
Services Part 76 Public File	)	
and Notice Requirements	)	

REPLY COMMENTS  
OF THE  
SMALL CABLE BUSINESS ASSOCIATION

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Attorneys for the Small Cable  
Business Association

September 24, 1998

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In the Matter of )  
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1998 Biennial Regulatory Review -- ) CS Docket No. 98-132  
Streamlining of Cable Television )  
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and Notice Requirements )

To: The Commission

**REPLY COMMENTS OF THE**  
**SMALL CABLE BUSINESS ASSOCIATION**

The Small Cable Business Association ("SCBA") files these reply comments to provide the Commission with additional information regarding use of an Internet home page to provide access to public file documents.

In its Notice of Proposed Rulemaking, the Commission requested comment on whether it should "grant operators the option of posting information on the Internet, where it may be more accessible than a paper file and less burdensome to maintain."<sup>1</sup> MediaOne Group, Inc. ("MediaOne"), opposed this option, commenting that it would, in reality, become more burdensome than maintenance of a paper public file.<sup>2</sup> MediaOne explained

From the outside, access to an Internet web site appears to be a simple matter of pointing and clicking. However, maintaining a web site which contains records which must be constantly added, removed or updated takes

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<sup>1</sup> Notice of Proposed Rulemaking in CS Docket No. 98-132, FCC 98-159 (released July 20, 1998).

<sup>2</sup> Comments of MediaOne Group, Inc. in CS Docket No. 98-132 (filed September 10, 1998), at 9 ("MediaOne Comments").

substantial employee and computer system resources. These resources are not inexpensive and are currently in high demand. Providing on-line access to many of the records required under the Commission's rules will be extremely difficult as they come from a variety of diverse sources and in formats which do not lend themselves to placement directly on a web site. Making such documents compatible with access via the Internet will require significant reformatting, retyping or document scanning, all of which add significant administrative costs and overhead. Additionally, the creation and updating of an Internet web site requires specialized training and knowledge. Many cable operators, especially small ones, do not have the resources or expertise in-house to establish and maintain such a web site. . . .<sup>3</sup>

SCBA concurs with MediaOne's analysis, especially as it relates to small cable businesses. As SCBA explained in its comments in this proceeding, "[s]ubscribers . . . absorb the cost of maintaining [a public] file. The fewer the subscribers, the higher the per-subscriber cost. Consequently, what amounts to an immaterial cost for a large system (e.g, 50,000 subscribers) can prove very high for small systems."<sup>4</sup>

The same is true for all public files — paper or electronic. Assume, for example, that maintenance of an electronic public file available via the Internet costs \$5,000 per system annually. The per-subscriber cost for a system with 100 subscribers equals \$50, \$5 for a system with 1,000 subscribers, but only \$.10 for a 50,000-subscriber system. The limited benefit an electronic public file may provide does not justify such expense for small

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<sup>3</sup> MediaOne Comments at 9.

<sup>4</sup> Comments of the Small Cable Business Association in CS Docket No. 98-132 (filed September 10, 1998), at 6 ("SCBA Comments").

systems, particularly since the "public file remains largely unused by the public."<sup>5</sup>

SCBA continues to urge the Commission to exempt small systems with up to 15,000 subscribers from any public file requirement — electronic or paper. Instead, the Commission should only require small systems to provide publicly available information upon request within a reasonable period of time.

**Respectfully submitted,**

**SMALL CABLE BUSINESS  
ASSOCIATION**

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September 24, 1998

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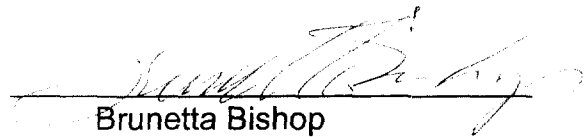
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<sup>5</sup> See SCBA Comments at 6.

**CERTIFICATE OF SERVICE**

I, Brunetta Bishop, of Bienstock & Clark, certify that on this 24<sup>th</sup> day of September, 1998, I caused the **REPLY COMMENTS OF THE SMALL CABLE BUSINESS ASSOCIATION** to be sent by First Class Mail to the following:

Susan M. Eid  
Margaret A. Sofio  
Gregory L. Cannon  
MediaOne Group, Inc.  
1919 Pennsylvania Avenue, N.W.  
Suite 600  
Washington, D.C. 20036

  
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Brunetta Bishop